

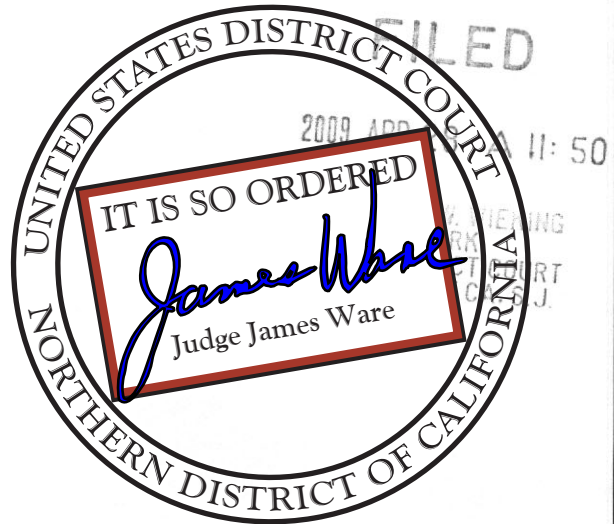
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Attorneys for Plaintiff



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CUI YING TONG,

Defendant.

No. CR 08-00471 JW

STIPULATION REGARDING  
FORFEITURE OF COUNTERFEIT  
GOODS SEIZED FROM THE  
DEFENDANT

On December 1, 2008, defendant Cui Ying Tong ("the defendant") pled guilty, pursuant to a plea agreement, to one count of trafficking in counterfeit goods. In the plea agreement, the defendant agreed to forfeit all of the counterfeit goods that were seized from her Toyota van on March 22, 2006. See 18 U.S.C. §§ 2320(b)(1)(A) and (b)(3)(A)(iii). The executed plea agreement contained an addendum listing numerous items that were subject to forfeiture. On December 23, 2008, the government filed an Application For a Preliminary Order of Forfeiture to begin the forfeiture process, and on January 14, 2009, the Court approved the application.

The government has recently learned that several seized items were inadvertently omitted from the forfeiture list attached to the plea agreement. Therefore, the parties agree and stipulate that the following items are subject to forfeiture pursuant to 18 U.S.C. §§ 2320(b)(1)(A) and

1 (b)(3)(A)(iii):

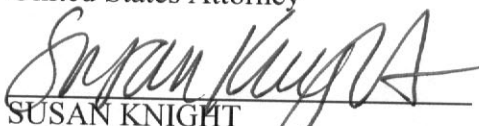
- 2 1. 8 Christian Dior Pairs of Socks;
- 3 2. 6 Fendi Handbags;
- 3 3. 6 Fendi Pairs of Socks;
- 4 4. 2 Louis Vuitton Handbags; and
- 4 5. 1 Burberry Coin Purse

5 The government will be filing another Application for a Preliminary Order of Forfeiture for the  
6 above-referenced items for the Court's approval.

7 SO STIPULATED.

8 Dated: 4/27/09

9 JOSEPH P. RUSSONIELLO  
United States Attorney

10   
11 SUSAN KNIGHT  
12 Assistant United States Attorney

13 Dated: 4/27/09

14   
CUI YING TONG  
15 Defendant

16 Dated:

17   
PETER D. JOHNSON  
18 Attorney for Defendant Tong  
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INTERPRETER CERTIFICATION

I, EDWARD CHU, hereby certify that I am a certified Cantonese [language] interpreter and that I accurately translated this stipulation regarding forfeiture to the defendant, she told me that she understood it, and I believe her answer was true and correct.

Dated: 4/27/09

Edward Chu  
Interpreter's signature